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17 **UNITED STATES DISTRICT COURT**
18 **NORTHERN DISTRICT OF CALIFORNIA**
19 **SAN JOSE DIVISION**

20 RED HAT INC.,
21 Plaintiff,
22
23 v.
24 VIRTAMOVE CORP.,
25 Defendant.

Case No. 5:24-cv-04740-PCP

**DECLARATION OF SUSAN CAMERON
IN SUPPORT OF PLAINTIFF
VIRTAMOVE'S REPLY IN SUPPORT
OF ITS MOTION TO DISMISS RED
HAT'S COMPLAINT UNDER FED. R.
CIV. P. 12(b)(1) AND 12(b)(2)**

I, Susan Cameron, declare as follows:

1. I am the Customer Engagement and Business Operations Manager and Office Manager at VirtaMove Corp. My job responsibilities include managing relationships with potential and existing customers, human resources activities, day-to-day accounting, and other various administrative activities.

2. There are no patent license agreements to U.S. Patent Nos. 7,519,814 (“the ’814 patent”) and 7,784,058 (“the ’058 patent”), or any other VirtaMove-owned patent, to any entity or individual.

3. VirtaMove has not offered any entity or individual an opportunity to enter into a patent license agreement to either the ’814 or ’058 patent (or any other patent).

4. VirtaMove has not filed a lawsuit asserting either the ’814 or ’058 patent (or any other patent) in the state of California.

5. The only patent infringement lawsuits VirtaMove has filed are *VirtaMove Corp. v. Amazon.com, Inc.*, No. 6:24-cv-00030 (W.D. Tex.); *VirtaMove Corp. v. Google LLC*, No. 7:24-cv-00033 (W.D. Tex.); *VirtaMove Corp. v. Hewlett Packard Enterprise Co.*, No. 2:24-cv-00093 (E.D. Tex.); and *VirtaMove Corp. v. International Business Machines Corp.*, No. 2:24-cv-00064 (E.D. Tex.).

6. Aside from providing the defendants documents associated with the four cases referenced above, VirtaMove has not sent any correspondence or made any other communications to any entity or individual indicating that any products or services infringe either the ’814 or ’058 patent (or any other patent).

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed at Ottawa, Ontario on October 30, 2024.



Susan Cameron